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1-27-2016

OPEN MEETING AGENDA ITEM

Commissioner Doug Little
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

Arizona Corporation Commission

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Dear Commissioner Little,

The following is in regard to the application for a Certificate of Environmental Compatibility for the proposed SunZia Transmission Line. We request that you deny this certificate, based largely on economic grounds as explained below. If you feel that you must grant this CEC, please include the condition at the end of this letter.

First, a brief background. For the past six years, various groups in Arizona have researched and authored reports, met with utility and regulatory agencies and lobbied state legislators, all in an effort to demonstrate that the proposed SunZia Transmission Line project is not in Arizona's best interests, is largely a deception, and will in the long-term result in lower revenues for the State Land Department than would be achieved by capitalizing on the largely untapped potential for environmental tourism in the San Pedro Valley from Benson north to San Manuel.

This economic potential has long been demonstrated in the upper San Pedro Valley. The portion of the Valley that would be despoiled if the ACC grants a CEC to SunZia arguably has greater potential than does the upper San Pedro Valley. This is the wildest and most scenic portion of the San Pedro Valley and thus has high potential for the eco-tourism business long enjoyed by merchants in the upper San Pedro Valley. With the recently proposed Vigneto mega-development near Benson, the potential for financial returns from eco-tourism has become far larger than the dubious benefits from SunZia.

The most likely outcome of granting a Certificate of Environmental Compatibility for the proposed SunZia project is that a) it will severely degrade a relatively pristine portion of the San Pedro Valley, b) that it will thus diminish the potential for eco-tourism, that c) by establishing a linear utility corridor, future utilities will be encouraged to co-locate and that d) the accumulation of infrastructure will discourage the efforts of advocates to continue protecting this part of the San Pedro Valley for its unique qualities of wildness and eco-tourism potential.

The SunZia project has been promoted by the applicant as a renewable energy project to bring "stranded" wind generated power from east-central New Mexico to the Pinal Central substation near Casa Grande. The best available feasibility study (for the now abandoned High Plains Express project, of which SunZia was originally a part) clearly demonstrated that a full-build of the SunZia project is not economical in the absence of a carbon tax, which we do not think you would support.


We believe the only portion of this project that will ever be built is from the proposed Willow

Grande. The route would be through the San Pedro Valley as described above.

Our request is simply that if a CEC is granted, that the SunZia project be required to prove that it is what it has been promoted to be since the applicant began the permitting process six years ago. Such a condition is very simple: That SunZia be completed from the Willow substation eastward to the wind fields near Corona, New Mexico, before construction is allowed to proceed from Willow to Pinal Central.

A connection with Tucson Electric Power's 345kV line at the proposed Willow Substation would provide adequate power to energize the SunZia line for testing and security purposes.

Thank you for your consideration in this matter.

A handwritten signature in cursive script that reads "David Omick".A handwritten signature in cursive script that reads "Pearl Mast".

David Omick and Pearl Mast,
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Benson, AZ 85602
520-212-4628